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August 25, 2023

The Honorable Susan Richard Nelson
United States District Court
316 N. Robert Street
St. Paul, MN 55101

Re: Request for Permission to Exceed Word Limit in *Anderson et al. v. Fortra LLC*, No. 0:23-cv-00533

Dear Judge Nelson:

Pursuant to Local Rule 7.1(f)(1)(D), Defendant Fortra LLC hereby submits this request for the Court's permission to exceed the word limit in its Reply in Support of its Motion to Dismiss, which is due September 18, 2023. Defendant submitted a memorandum of law with its Motion to Dismiss which included 10,986 words. Defendant requests an additional 5,000 words beyond the 12,000 limit imposed on the combined memorandum of law and reply brief by L.R. 7.1(f)(1)(B). With this extension, Defendant's reply brief would have a limit of approximately 6,000 words. Additional words are needed for this brief because of the complex nature of this case and the evolving body of law related to data security incidents needed to be addressed in the briefing.

Counsel for Defendant has communicated with counsel for plaintiffs regarding this request. Plaintiffs' counsel stated that it did not oppose an extension of 3,000 words. The parties also agreed that if the Court were to grant Defendant permission to exceed the word limit, the parties request that the same permission be granted to plaintiffs for their opposition brief, due August 28, 2023.

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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gilbert S. Keteltas". The signature is stylized with a large initial "G" and a cursive script.

Gilbert S. Keteltas
Partner